

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth St. SW
Washington, D.C. 20554

**Re: Federal-State Joint Board on Universal Service CC Docket No. 96-45
and
Changes to the Board of Directors of the National Exchange Carrier Association
CC Docket No. 97-21**

Dear Ms. Dortch:

On behalf of several Virginia school divisions and the Virginia Department of Education with Applications for Review or Petitions for Reconsideration before the Commission, I made presentations to Jordan Goldstein, Matthew Brill, Addison Golladay, Daniel Gonzalez, and Kyle Dixon on June 5, 2002.

We discussed issues related to the pending Applications for Review from Lunenburg and Henrico Counties and Petitions for Reconsideration from Dickenson County and the Virginia Department of Education. The presentations were made as Power Point slides, the text of which is included with this letter. All other information presented is publicly available through Commission decisions or applicant filings.

In accordance with Commission rules, I submit this notice for public inspection in the above proceedings.

Respectfully Submitted this Sixth day of June, 2002,

Greg Weisiger

Virginia Department of Education
P.O. Box 2120
Richmond, VA 23218
(804) 692-0335

CC: Jordan Goldstein
Matthew Brill
Daniel Gonzalez
Kyle Dixon
Addison Golladay

Virginia E-Rate Appeals Presentation

General E-Rate Issues:

- NPRM
- Waste, Fraud, and Abuse
 - Is the cure worse than the cause?
 - Too many denials and rejections, leading to...
 - too many appeals and resulting backlog.
 - Where is the Beef?
- Open Communication is Essential!

Virginia E-Rate Appeals Presentation

Henrico County Application for Review:

Filed Form 471 for Year 2 internal connections
citing a Year 3 470.

Year 2 470 Web site shut down in October 1999
- No Y2 applications posted between October and February

Inadequate notification for vendors

No choice but to post requests on Y3 470!

Virginia E-Rate Appeals Presentation

Lunenburg Application for Review:

Thirty percent of request ineligible?

Antennas on the NICs are eligible!

Installation costs should not be pro-rated.

Either way, ineligible portion falls below thirty percent!

Virginia E-Rate Appeals Presentation

Virginia DOE Petition for Reconsideration:

Evolving notion of a common carrier

Will the real common carriers please stand up?
(and contribute to the fund)

DOE request for information

Virginia E-Rate Appeals Presentation

Topics for Discussion:

- SLD Failure to Post Year 2 Form 470
- MasterMind decision and 470 eligibility
- Calculation of ineligible services
- What exactly constitutes a “common carrier?”

**On behalf of the applicants and
appeals**



For your time this afternoon.